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Attorneys for Plaintiffs and the Proposed Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

ROCHELLE ANTHONY, an individual, on
behalf of herself and others similarly situated,

PLAINTIFF,

v.

CITIZEN WATCH COMPANY OF
AMERICA, INC.; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

CASE NO. 20STCV00171

[Case Assigned for All Purposes to Hon. Maren
E. Nelson in Dept. SSC-17]

**DECLARATION OF TRAVENIA
MORRIS IN SUPPORT OF FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: September 28, 2021

Time: 9:00 a.m.

Dept.: 17

Complaint Filed: January 3, 2020

FAC Filed: March 9, 2020

SAC Filed: January 26, 2021

Trial Date: None Set

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I, Travenia Morris, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and one of the named Plaintiffs in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant CITIZEN WATCH COMPANY OF AMERICA, INC. (“Citizen” or “Defendant”). I was hired by Citizen around 2013 and performed work for Citizen as a shipping clerk and senior clerk at Citizen’s warehouse in Torrance, California.

3. I brought this lawsuit, on behalf of myself and all other Settlement Class Members, against Defendant because I believe that Citizen failed to pay all wages and/or overtime, failed to provide meal breaks, failed to issue accurate itemized wage statements to me and other employees, and failed to pay all wages due at the time of termination, among other violations.

4. I understand that I am representing other employees and I believe that I am able to represent them well. I also understand that I have an obligation to protect the interests of the other class members, even if this creates a burden for me.

5. I learned about this case after it had been filed. I decided to become involved because I don't think Citizen was paying us correctly, and I have a lot of knowledge about the company's practices due to the amount of time I worked there and my position as a senior clerk. Once retained, I compiled relevant documents from my employment to assist my attorneys. I spent considerable time with the attorneys discussing and developing the facts and legal claims in this lawsuit.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my attorneys' various communications regarding this matter, actively participating in

1 mediation by telephone, and reviewing and analyzing the settlement agreement and settlement
2 papers to ensure the settlement was fair and reasonable and in the best interests of the Settlement
3 Class Members.

4 7. I estimate the total time spent in connection with this matter is approximately 20-
5 25 hours.

6 8. I have worked to actively represent the other Settlement Class Members and their
7 interests.

8 9. I have always kept the Settlement Class Members interests at heart in this
9 litigation.

10 10. I am prepared to continue assisting with this litigation and am committed to
11 achieving the best possible results for the Settlement Class Members.

12 11. I believe that the class action settlement obtained on behalf of the Settlement Class
13 Members is fair and reasonable in light of the issues involved in this case. As mentioned above,
14 I reviewed and discussed the Settlement Agreement with my attorneys and asked them questions
15 about it to ensure that I understood its terms and what it would mean for all of the Settlement
16 Class Members.

17 12. I believe that I have fairly represented the absent Settlement Class Members and
18 request that the Court finally approve this settlement and confirm me as a named Plaintiff.

19 13. I am not aware of any conflicts of interest that prevent me from being confirmed
20 as a named Plaintiff in this Action. I am not related in any way to my attorneys or to any other
21 member of the firm that is representing me. I have no business dealings or other involvement
22 beyond this lawsuit and this representation. I have not been promised any money or inducement
23 to serve as a named Plaintiff in this Action.

24 14. It is my opinion that the settlement agreement provides for a fair and adequate
25 enhancement for me as a named Plaintiff, in the amount of \$5,000.00. I believe that this is fair
26 and reasonable in light of all of the work that I have performed in my role as a named Plaintiff.
27 As a named Plaintiff, I have actively participated in all stages of the litigation, as detailed above,
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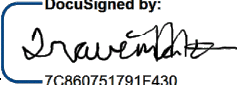
1 and have always maintained the best interests of the Settlement Class Members while performing
2 my Plaintiff duties.

3 15. It is also my opinion that the Incentive Award is fair, reasonable, and adequate
4 because, in addition to the many hours spent participating in the prosecution of this case, I
5 accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we were
6 unsuccessful in this Action. Likewise, I risk the potential stigma of being a named Plaintiff in a
7 class action labor dispute, which may affect my future employability. Despite these potential
8 risks, I felt it was important to proceed with this litigation on behalf of myself and others in the
9 capacity of a named Plaintiff.

10 16. As noted in my declaration submitted previously, I do not have any interest,
11 relationship, or financial ties to the proposed nonprofit recipient of uncashed class funds, Bet
12 Tzedek Legal Services. I only first learned about Bet Tzedek in connection with the proposed
13 settlement in this matter.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16 Executed this 20 day of August, 2021 at Compton, California.
17 (City)

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20 TRAVENIA MORRIS
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On August 31, 2021, I served all interested parties in this action the following documents described as: **DECLARATION OF TRAVENIA MORRIS IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Ashley Farrell Pickett
Ryan C. Bykerk
Bryan W. Patton
Matthew J. Weber
farrellpickett@gtlaw.com
bykerkr@gtlaw.com
pattonbw@gtlaw.com
webermat@gtlaw.com

GREENBERG TRAURIG, LLP
1840 Century Park East, Suite 1900
Los Angeles, CA 90067

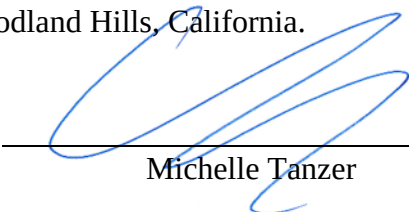
[] (BY MAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[XX] BY ELECTRONIC MAIL THROUGH CASE ANYWHERE: On interested parties set forth on the attached service list.

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 31, 2021, at Woodland Hills, California.



Michelle Tanzer